

EXHIBIT 2

**Application of U.S. Patent No. 9,696,847 to
ZTE USA, Inc. (“Defendant”) via its ZTE
Smartphones and Tablets with Pattern Lock
Functionality (“Accused Products”)***


* This claim chart is meant to be illustrative for purposes of meeting Plaintiff’s pleading obligations and should not be construed as binding or limiting. Plaintiff will serve infringement contentions in this case in accord with the Local Rules and scheduled entered by the Court.

13. A user interface method, comprising:

ZTE makes, uses, imports, sells and/or offers for sale Android smartphones that perform the methods claimed by U.S. Patent No. 9,696,847. For example, ZTE Android smartphones and tablets implement the method of claim 13 when configuring or implementing Pattern Lock. On information and belief, ZTE, or an agent of ZTE acting on its behalf, has, via its testing of the Accused Products, caused the Accused Products to practice the claimed user interface method. In addition, in the alternative to direct infringement, ZTE has induced end users of the Accused Products to cause the Accused Products to practice the claimed user interface method.

Protecting Your Phone With Screen Locks

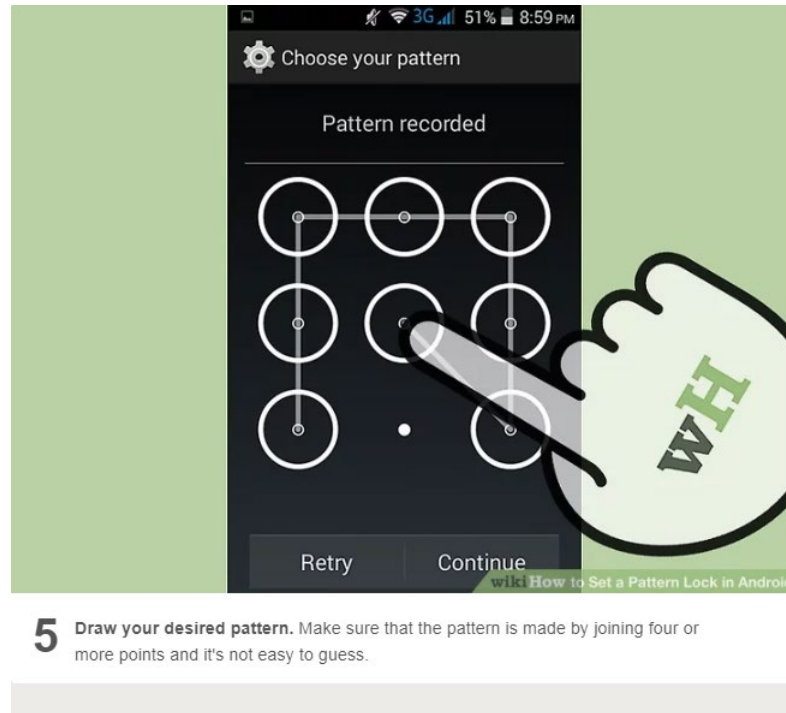
You can protect your phone by creating a screen lock. When it is enabled, you need to swipe up on the screen, and then draw a pattern or enter a numeric PIN or password to unlock the phone's screen and keys.

1. Swipe up on the home screen and touch **Settings > Security & location > Screen lock**.
 2. Touch **None, Swipe, Pattern, PIN, or Password**.
 - ▶ Touch **None** to disable screen lock protection.
 - ▶ Touch **Swipe** to enable screen lock and allow unlocking with a "swipe" gesture. You can unlock the screen by swiping up on the screen.
 - ▶ Touch **Pattern** to create a pattern that you must draw to unlock the screen.
 - ▶ Touch **PIN or Password** to set a numeric PIN or a password that you must enter to unlock the screen.
 3. For Pattern, PIN, or Password lock, select whether to protect your phone by requiring your pattern, PIN or password before it starts up. Then follow the on-screen prompts to continue.
-  **NOTE:**
When this feature is enabled, your phone cannot receive calls, messages, or notifications until it starts up.
4. For Pattern, PIN, or Password lock, select how you would like notifications and their contents to show when the phone is locked, and then touch **DONE**.

See, e.g., ZTE Blade MAX 2s User Manual, available at <https://www.zteusa.com/products/all-phones/blade-max-2s.html>

defining an enablement protocol for a function of an electronic device, said enablement protocol comprising a user-defined gesture for touch input on a touch-sensitive area of a display screen operatively associated with said electronic device by displaying at least two visual indicators on the touch-sensitive area of the display screen indicative of a plurality of different possible gestures and inputting the user-defined gesture which includes a continuous touch which terminates at one of the at least two visual indicators on the touch-sensitive area of the display screen for the enablement protocol;

ZTE smartphones and tablets define an enablement protocol for a function of an electronic device when a user sets a pattern for pattern lock.



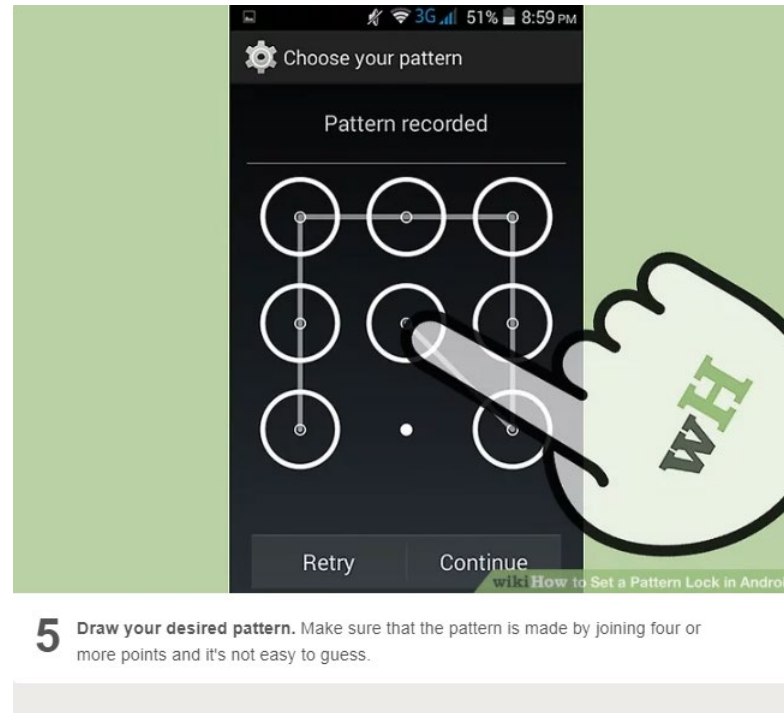
<https://www.wikihow.tech/Set-a-Pattern-Lock-in-Android>; see also, e.g., https://support.sprint.com/support/tutorial/Set-a-screen-lock-pattern-ZTE-Furytrade/WScenario_542_34337_771_en_171-dvc6290010prd



https://www.att.com/devicehowto/tutorial.html#!/stepbystep/id/stepbystep_KM1320971?make=ZTE&model=ZTEZ831&gsi=617u5g

defining an enablement protocol for a function of an electronic device, **said enablement protocol comprising a user-defined gesture for touch input on a touch-sensitive area of a display screen operatively associated with said electronic device** by displaying at least two visual indicators on the touch-sensitive area of the display screen indicative of a plurality of different possible gestures and inputting the user-defined gesture which includes a continuous touch which terminates at one of the at least two visual indicators on the touch-sensitive area of the display screen for the enablement protocol;

The pattern is a user-defined gesture for touch input on the touch screen of an ZTE smartphone or tablet.



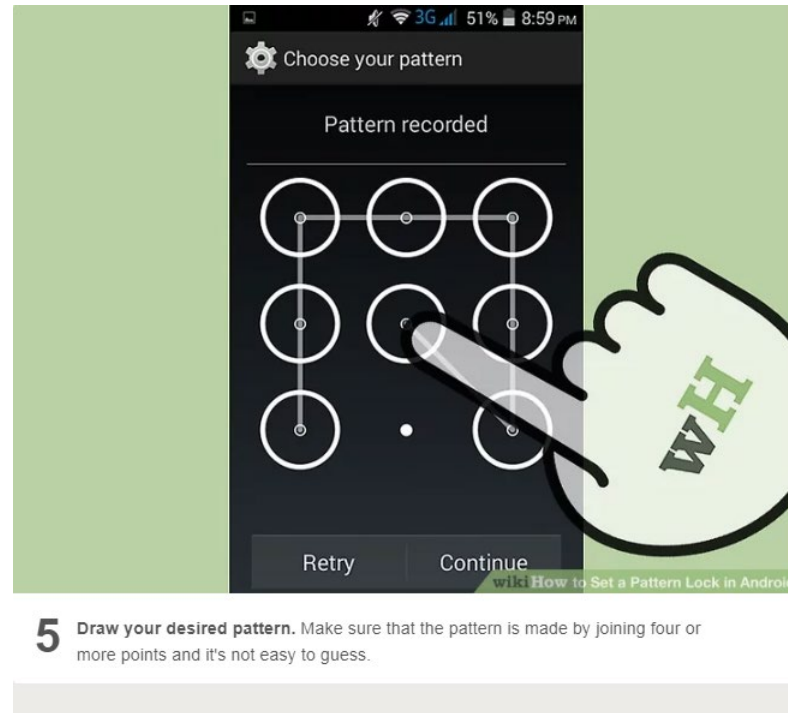
<https://www.wikihow.tech/Set-a-Pattern-Lock-in-Android>;
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defining an enablement protocol for a function of an electronic device, said enablement protocol comprising a user-defined gesture for touch input on a touch-sensitive area of a display screen operatively associated with said electronic device **by displaying at least two visual indicators on the touch-sensitive area of the display screen indicative of a plurality of different possible gestures and inputting the user-defined gesture which includes a continuous touch which terminates at one of the at least two visual indicators on the touch-sensitive area of the display screen for the enablement protocol;**

ZTE smartphones and tablets define an enablement protocol by displaying a grid on which a user can draw a pattern (i.e., displaying at least two visual indicators on the touch-sensitive area of the display screen indicative of a plurality of different possible gestures) and interpreting a pattern drawn by the user (i.e., inputting the user-defined gesture which includes a continuous touch which terminates at one of the at least two visual indicators on the touch-sensitive area of the display screen for the enablement protocol).



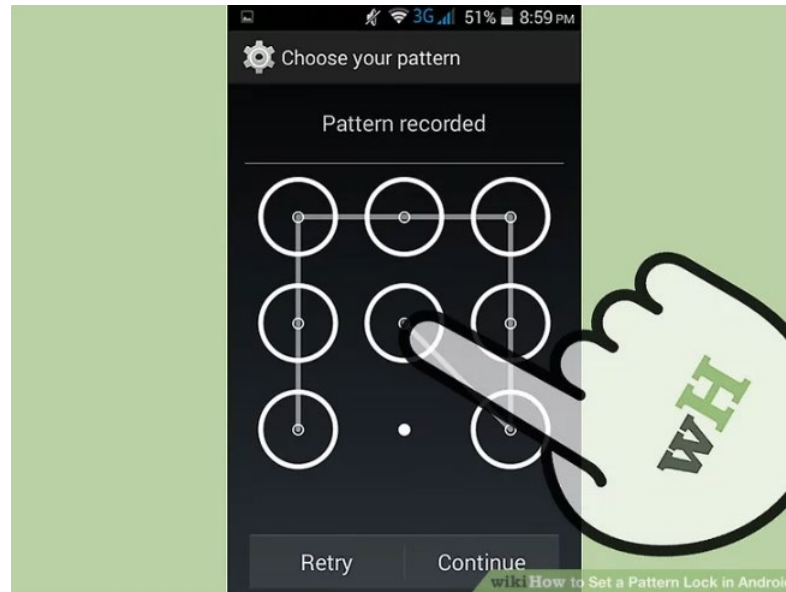
<https://www.wikihow.tech/Set-a-Pattern-Lock-in-Android>;
see also, e.g., https://support.sprint.com/support/tutorial/Set-a-screen-lock-pattern-ZTE-Furytrade/WScenario_542_34337_771_en_171-dvc6290010prd



https://www.att.com/devicehowto/tutorial.html#!/stepbystep/id/stepbystep_KM1320971?make=ZTE&model=ZTEZ831&gsi=617u5g

retaining said enablement
protocol of said function; and

ZTE smartphones and tablets store the pattern (i.e., said enablement protocol of said function) for future use after a user draws the pattern (e.g., by selecting “CONTINUE”).



5 Draw your desired pattern. Make sure that the pattern is made by joining four or more points and it's not easy to guess.

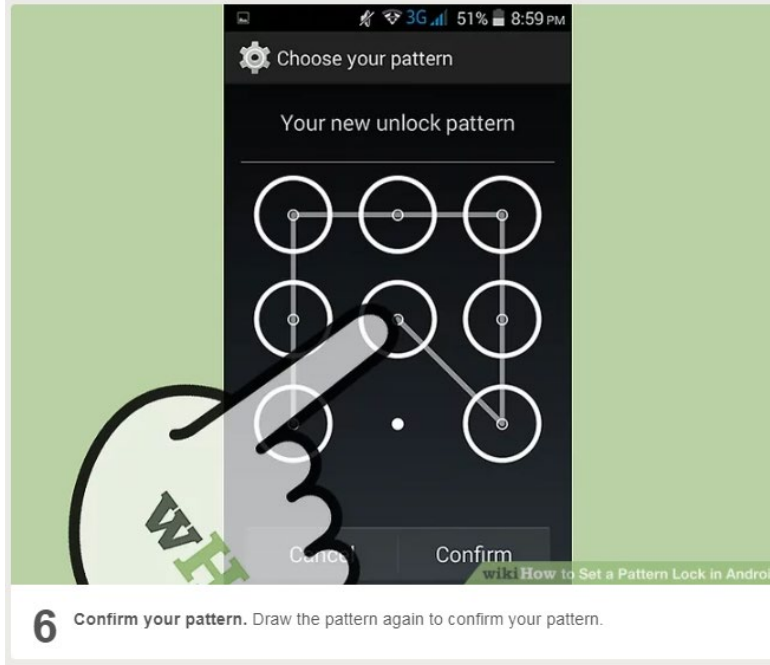
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displaying the at least two visual indicators on the touch-sensitive area of the display screen and receiving a gesture for touch input on the touch sensitive area of the display screen that substantially reproduces the user-defined gesture that includes the continuous touch which terminates at the one of the at least two visual indicators corresponding to said retained enablement protocol to enable said function.

ZTE smartphones and tablets confirm a pattern by displaying a grid on which a user can draw a pattern (i.e., displaying the at least two visual indicators on the touch-sensitive area of the display screen) and receiving from the touch screen display a pattern drawn by a user (i.e., receiving a gesture for touch input on the touch sensitive area of the display screen that substantially reproduces the user-defined gesture that includes the continuous touch which terminates at one of the at least two visual indicators corresponding to said retained enablement protocol to enable said function).



<https://www.wikihow.tech/Set-a-Pattern-Lock-in-Android>; see also, e.g.,

<https://support.sprint.com/support/tutorial/Set-a-screen-lock-pattern-ZTE->

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